

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	WC Docket No. 03-109
Lifeline and Link-Up	)	

**COMMENTS OF QWEST  
COMMUNICATIONS INTERNATIONAL INC.**

Qwest Communications International Inc. (“Qwest”) submits these comments in response to the Public Notice that the Wireline Competition Bureau seeks to refresh the record in the above-captioned proceeding.<sup>1</sup> As a provider of Lifeline and Link-Up services in fourteen western states, Qwest has a strong interest in this proceeding. With respect to whether the Federal Communications Commission (“Commission”) should adopt rules governing the advertising of these programs, Qwest views that such additional rules would not benefit these programs.

From Qwest’s experience, outreach for these government-created programs will be most effective when it is done through the public agencies that already have contacts with the consumers who are eligible for these programs. Putting in place specific advertising requirements for eligible telecommunications carriers (“ETC”) addresses only a small piece of the outreach opportunities for these programs and may actually impose costs on ETCs that do little to improve subscribership in the programs.

Effective outreach requires at least two components: (1) making eligible consumers aware of the programs and their eligibility for the programs; and (2) having eligible consumers enroll in the programs. For the first component, there still needs to be flexibility to design

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<sup>1</sup> *Public Notice*, DA 07-1241, 22 FCC Rcd 4872 (2007); 72 Fed. Reg. 40816 (July 25, 2007).

outreach approaches that will reach target audiences in a cost-effective manner.<sup>2</sup> Further, efforts to improve outreach and ultimately increase telephone service subscribership by eligible individuals must go well beyond ETCs' advertising of the programs. Outreach collaboration must be encouraged, and especially obtaining the involvement of government and public assistance agencies and organizations that already have contacts with eligible consumers. For the second component, efforts to improve participation besides advertising requirements should be considered. Qwest's experience suggests that tools that make the actual application process easier, such as automatic enrollment through another qualifying program or standardizing applications and applications processes within each state, may be much more effective at achieving greater consumer participation than placing specific advertising requirements on ETCs.

Currently, the Commission requires all ETCs to "[p]ublicize the availability of Lifeline service [and LinkUp support] in a manner reasonably designed to reach those likely to qualify for the service [and support]."<sup>3</sup> Pursuant to this existing requirement, Qwest has engaged in a variety of Lifeline and Link-Up outreach efforts including advertising the availability of the services in bill inserts, in DEX Call Guide Pages, in new customer welcome packages, in brochures, on the Qwest web site, through a multi-media (radio and bus sign) awareness campaign, and occasionally through press releases. Qwest's outreach efforts also include distribution of Tribal Lifeline applications by network technicians working on reservations, Tribal Lifeline information booths at regional Pow Wows as well as several Native American

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<sup>2</sup> Prior commenters such as Verizon and Sprint have emphasized the importance of allowing states and ETCs flexibility to implement varied outreach activities as best suited to reach particular consumer groups and communities. *See* Comments of the Verizon Telephone Companies, WC Docket No. 03-109, filed Aug. 23, 2004 at 6-7; Comments of Sprint Corporation, WC Docket No. 03-109, filed Aug. 23, 2004 at 5-7.

<sup>3</sup> 47 C.F.R. §§ 54.405(b) and 54.411(d).

conferences, print ads in Native American publications, radio ads on stations which reach reservations served by Qwest, posters distributed to each reservation served by Qwest, and the establishment of a tribal liaison within each reservation who agreed to work with Qwest to identify local activities to help promote the availability of Tribal Lifeline.

To date, most of these outreach efforts have been independent of a government agency. Qwest has found that solo outreach efforts have had limited success in increasing the number of customers purchasing its Lifeline and Link-Up services. For example, throughout 2006, Qwest ran a Lifeline outreach campaign targeted at reaching low-income individuals in 23 of the largest metropolitan areas in its region. Qwest ran approximately 1,000 sixty-second radio spots each quarter describing the Lifeline and Link-Up programs. These radio ads also included a special toll-free telephone number which customers could call for more information. During this same time period, Qwest also used interior bus signs to advertise the availability of Lifeline and Link-Up services in twelve of these same markets. The bus signs also included the special toll-free number. At the end of 2006, Qwest had received a total of 2,276 calls to the advertised toll-free number, and most likely, only a portion of these calls resulted in actual Lifeline enrollment. The Commission's most recent estimates reflect that there are approximately 315,000 low-income households without telephone service in the fourteen-state region that Qwest serves.<sup>4</sup> Thus, at best, Qwest's outreach campaign generated calls from fewer than 1% of this target consumer base.<sup>5</sup>

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<sup>4</sup> See Industry Analysis and Technology Division, Wireline Competition Bureau, Federal Communications Commission, Telephone Penetration by Income by State, rel. May 2007, Tables 5 & 6. This number is the sum of each Qwest-region state's 2006 total low-income households in the state (from Table 6) less each state's 2006 total low-income household in the state with telephone service (from Table 5).

<sup>5</sup> This assumes that every call was from a low-income consumer who did not have telephone service, which is probably not the case.

Qwest has also tried a variety of outreach approaches for its Tribal Lifeline and Tribal Link-Up programs. These outreach efforts have included sponsorship and informational booths at major Pow Wows and seminars, print ads in monthly periodicals targeted to Native Americans, radio ads, posters, a “tell-a-friend” campaign, participation at local tribal events, and brochures distributed by local network technicians who work on reservations. Qwest spent approximately \$100,000 on these efforts in 2005 and added 250 new households to the programs, and a significant piece of these efforts -- 79 households -- was the outreach work by one tribal liaison on one reservation who encouraged tribal members to sign up for Tribal Lifeline as they were being approved for the Low Income Home Energy Assistance Program (“LIHEAP”). Based on these numbers, the cost of Qwest’s tribal outreach efforts in 2005 was approximately \$400 per new applicant. While these outreach efforts have had success in increasing enrollment in Tribal Lifeline services, this high cost of outreach per applicant makes these efforts unsustainable in the long run. More cost-effective outreach efforts need to be used.

Where Qwest has seen the greatest increases in Lifeline enrollment is where outreach has been conducted in conjunction with a state, local or tribal agency which enrolls low-income consumers in qualifying government assistance programs, such as LIHEAP, Food Stamps, or Temporary Assistance for Needy Families (“TANF”). In states where consumers are provided an opportunity to enroll for Lifeline benefits at the time they are enrolling for another qualifying program, such as in New Mexico, Iowa, North Dakota and Washington, Qwest’s Lifeline customers as a percentage of Qwest’s per-state customer bases are higher.<sup>6</sup> Consequently, Qwest

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<sup>6</sup> In New Mexico and Iowa, customers enrolling in LIHEAP are provided an opportunity to enroll for Lifeline benefits at that time. In North Dakota, the Department of Human Services sends individuals who have recently enrolled in a qualifying program a certificate of eligibility which they are instructed to forward to their telephone company in order to be enrolled in Lifeline. In Washington, the Department of Social and Health Services automatically sends a multi-lingual

believes that the Commission should continue to encourage state commissions to work with other state, local and tribal agencies and carriers to implement cost-effective state-wide outreach regarding Lifeline and Link-Up services. Qwest believes that if state agencies would incorporate Lifeline and Link-Up outreach and applications into their current enrollment processes for qualifying programs, individual states would be able to maximize the effectiveness of each outreach dollar spent and significantly increase the enrollment of their qualified citizens.<sup>7</sup> One way to encourage such cooperative efforts would be for the Commission to provide a funding mechanism to support cooperative outreach and/or Lifeline enrollment assistance at the government agency level.

If the Commission intends to improve telephone subscribership of low-income consumers, it needs to shift its outreach focus. Instead of defining specific advertising requirements for ETCs, the Commission should look for ways to encourage automatic enrollment by agencies that currently enroll individuals in qualifying programs and to assist states in the development of uniform program applications and outreach advertising. These steps are not only best suited to increasing low-income consumers' awareness of the Lifeline and Link-Up programs but also best suited to increasing eligible consumers' participation in the programs. Only through increased participation can the Commission ever accomplish the true goal of increased telephone subscribership of low-income consumers.

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pamphlet explaining how to enroll in the Washington Telephone Assistance Program to individuals who have recently enrolled in a qualifying program.

<sup>7</sup> The joint Commission, NARUC, NASUCA "Lifeline Across America" Working Group earlier this year released a report and identified specific next-step strategies for improving Lifeline and Link-Up outreach. Those next steps included assisting states exploring automatic enrollment with "how-to" information and urging states to consider uniform, statewide applications for Lifeline and Link-Up for use by all ETCs in a state. Report of the FCC/NARUC/NASUCA Working Group on Lifeline and Link-Up: "Lifeline Across America", rel. Feb. 2007, <http://www.lifeline.gov/>. Qwest supports the pursuit of these next steps.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be: 1) filed with the Office of the Secretary of the FCC via ECFS in WC Docket No. 03-109; 2) served via e-mail on Ms. Antoinette Stevens, Telecommunications Access Policy Division, Wireline Competition Bureau at [Antoinette.stevens@fcc.gov](mailto:Antoinette.stevens@fcc.gov); 3) served via e-mail on Ms. Erika Olsen, Telecommunications Access Policy Division, Wireline Competition Bureau at [Erika.olsen@fcc.gov](mailto:Erika.olsen@fcc.gov); and 4) served via e-mail on the FCC's duplicating contractor, Best Copy and Printing, Inc. at [www.bcpiweb.com](http://www.bcpiweb.com).

/s/Richard Grozier

August 24, 2007